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AUG 27 2001

August 21, 2001

U.S. Environmental Protection Agency
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, IL 60604

Re: Chemical Recovery Systems Site - Response of Vanguard Paint and Finishes, Inc. to General Notice of Potential Liability

Dear Ms. Johnson:

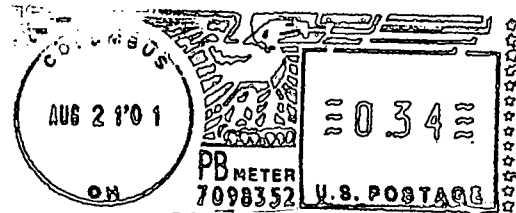
We have recently received the USEPA Region 5's August 10, 2001 General Notice of Potential Liability directed to Vanguard Paint and Finishes, Inc. ("Vanguard") regarding the Chemical Recovery Systems Site (the "Site") in Elyria, Ohio. Vanguard intends to submit its response to the Notice of Potential Liability on or before September 10, 2001.

Vanguard has conducted an initial investigation of available information to determine whether there is any information indicating that it generated or transported hazardous materials which were disposed of at the Site. Based on a review of waste manifests, other documents relevant to historic waste disposal and the personal knowledge of long-term employees, Vanguard has not identified any information which indicates that materials generated at the facility were disposed of at the Site. In addition, we have not received any documentation from the USEPA, either in the form of a "dirty inventory" list or an accounts receivable ledger, which names Vanguard as being associated with the Site.

Given that we have no information that any of Vanguard's wastes were disposed of at the Site, Vanguard is not in a position to agree to perform or finance additional investigation and/or remediation of the Site. Vanguard understands that USEPA's investigation

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